

Submitting Attorney (Utah State Bar No.) John W. Christiansen11374
Address 642 Kirby Lane STE 105 Spanish Fork, UT 84660
Telephone No. 801-798-9000
Facsimile No. (Optional) 801-798-4670
E-Mail Address (Recommended) john@mckellchristiansen.com
Attorney for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH

In re: Julie Ann Elizabeth Curtis	Bankruptcy No. 15-21193
Debtor(s).	Chapter 13
	Hon. William T. Thurman

MOTION TO WITHDRAW AS COUNSEL

1. Pursuant to Local Rule 2091-2, (c)(1) John Christiansen (“Counsel”),
hereby moves to withdraw as counsel for:

Client Name: (the “Client”) Julie Ann Elizabeth Curtis
Address: 42 East Center
City, State, Zip: Salem, UT 84653
Telephone Number(s): 801-687-9096
E-Mail Address: julieannbcurtis@gmail.com

2. The reasons for withdrawal are as follows:
The Debtor has asked to me to withdraw. She apparently would like to represent herself in some upcoming hearings and a recently-filed chapter 13 case for which my office has had no involvement or notice about until after they were filed. I do not object to this request and as such am honoring the Debtor's request to withdraw as counsel of record.

3. In the event this motion is granted, Client or new counsel for Client (including new counsel in the withdrawing attorney’s law firm), must file a notice of appearance within 21 days after entry of the order, unless otherwise ordered by the court. Pursuant to Local Rule 9011-2(a),

no corporation, association, partnership, limited liability company or other artificial entity may appear pro se, but must be represented by an attorney who is admitted to practice in this court.

4. This motion is made: [*State the alternative that applies*]

☒ with the client's consent, which is attached to this motion; or

☐ without client's consent and is accompanied by:

☐ certification that Client has been served with (i) a copy of this motion, (ii) the attached written description of the status of the case, including the dates and times of any scheduled court proceedings, pending compliance with any existing court orders, and the possibility of sanctions;

or

☐ certification that the Client cannot be located or, for any other reason, cannot be notified of the pendency of the motion and status of the case.

5. The undersigned certifies: [*State the alternative that applies*]

☐ there are no pending motions or trials; or

☒ a hearing on [5/16/2018 at 02:00 PM].

☒ a certification signed by Counsel is attached indicating that Client is prepared for trial as scheduled and is eligible pursuant to Local Rule 9011-2(b) to appear *pro se* at trial; or

☐ the following specific facts justify withdrawal of counsel without the present appearance of substitute counsel or the appearance by the individual party *pro se*:

[

]

CERTIFICATION

Counsel hereby certifies that a copy of this Motion for Withdrawal of Counsel has been sent to the Client at the address indicated above.

Dated this 25 Day of April , 20 18 .

/s/ John Christiansen

Moving Attorney

CERTIFICATE OF SERVICE

(Attach Local Form 9013-3)

FILED IN THE
UNITED STATES
BANKRUPTCY COURT

Unrepresented Debtor
Julie Ann Elizabeth Curtis
42 E. Center St.
Salem, UT 84653
Cell Phone: (801)687-9096

2018 APR -2 AM 10: 12

DISTRICT OF UTAH
DEPUTY CLERK

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH

In re: Julie Ann Elizabeth Curtis PRO SE Debtor Address: 42 E. Center St. Salem, UT 84653 Last 4 digits of Social Security:1868	Case No: 15-21193 Chapter 13 Trustee: Lon Jenkins Judge: Hon. William T. Thurman
---	---

MOTION TO DISMISS ATTORNEY

The debtor filed a Chapter 13 Bankruptcy on 02/17/2015.

The debtor would like to DISMISS her ATTORNEY.

Dated this 31st Day of March, 2018.


Julie Ann Elizabeth Curtis, PRO SE Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH

In re: Julie Ann Elizabeth Curtis PRO SE Debtor Address: 42 E. Center St. Salem, UT 84653 Last 4 digits of Social Security:1868	Case No: 15-21193 Chapter 13 Trustee: Lon Jenkins Judge: Hon. William T. Thurman
---	---

PROOF OF MAIL SERVICE

I, Susan Ossola, declare that: I am a resident in the County of Salt Lake County, State of Utah. My residence address is 3323 W. Water St., Riverton, UT 84065. I am over the age of eighteen years and not a party this case. On 3/31/2018 I mailed the enclosed MOTION TO DISMISS ATTORNEY to the following parties:

John Christiansen
McKELL Christiansen & Wise PLLC
642 Kirby Lane, Suite 105
Spanish Fork, UT 84660

Lon Jenkins, TRUSTEE
405 S. Main St., Suite 600
Salt Lake City, UT 84111

US Trustee
Washington Federal Bldg.
405 S. Main St., Suite 300
Salt Lake City, UT 84111

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on 3/21/2018, at the Riverton Post Office, Riverton, UT.


Susan Ossola

John W Christiansen (13174)
MCKELL CHRISTIANSEN & WISE
Attorneys for Debtors
642 Kirby Lane, STE 105
Spanish Fork, UT 84660
801-798-4656
john@mckellchristiansen.com

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH
CENTRAL DIVISION**

IN RE: Julie Ann Curtis Debtors	CASE NO: 15-21193 Chapter 13 Hon. WTT
---	---

CERTIFICATION UNDER LBR 9011-2(B)

I hereby Certify as Counsel for the Debtor, that Client is prepared for trial as scheduled and is eligible pursuant to Local Rule 9011-2(b) to appear *pro se* at trial at the upcoming hearing to address the Debtor's *Pro Se* Motion to Dismiss Case, which she prepared, filed, and scheduled of her own accord and volition (without my involvement or notice).

The Debtor, receiving a copy of this notice, is notified that An individual appearing without an attorney will be expected to be familiar with and must comply with (A) these Local Rules; (B) unless otherwise provided, the Utah Rules of Professional Conduct as revised and amended; (C) appropriate federal rules and statutes that govern the action in which such individual is involved; and (D) the decisions of this court interpreting those rules and standards. Failure to comply with this rule may be grounds for dismissal of a case or proceeding, conversion of a case, appointment of a trustee or examiner, judgment by default, or other appropriate sanctions.

DATED, this April 25, 2018

/s/ John Christiansen

CERTIFICATE OF SERVICE BY ELECTRONIC NOTICE (CM/ECF)

I hereby certify that on [April 25, 2018], I electronically filed the foregoing EX-PARTE MOTION TO WITHDRAW AS COUNSEL OF RECORD with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users.

(US Trustee)

(Chapter 13 Trustee)

CERTIFICATE OF SERVICE BY MAIL OR OTHER MEANS

I hereby certify that on [April 25, 2018], I caused to be served a true and correct copy of the foregoing foregoing EX-PARTE MOTION TO WITHDRAW AS COUNSEL OF RECORD PLAN as follows:

Mail Service to All Parties in Interest: First-class U.S. mail, postage pre-paid, addressed to all parties who did not receive electronic service as set forth herein:

Julie Ann Elizabeth Curtis (Debtor)
42 East Center
Salem, UT 84653

/s/ John Christiansen